

UNITED STATES DISTRICT COURT

for the

Western District of New York state

Division

Case No.

25 CV 460-V

(to be filled in by the Clerk's Office)

Tamjid Mahmud Hossain

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Michael C. Cimasy Deborah A. Haendiges
City of Lackawanna Police

John Garcia

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Jury Trial: (check one) ☒ Yes ☐ No

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Tamjid Mahmud Hossain

Street Address

2807 South park Ave

City and County

Lackawanna Erie

State and Zip Code

New York 14218

Telephone Number

716-275-5494

E-mail Address

tamjidhossain@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Lackawanna City Police government agency, Michael Cimasy individual working for
an agency assigned Counsel of Western N.Y. Deborah A. Haendiges individual working
for Government agency Erie County Court.

Pro Se 1 (Rev. 12/16) Complaint for a Civil Case

Defendant No. 1

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Micheal C. Cimasy

Assigned Counsel

66 Park Circle

Amherst Erie

New York 14226

716-267-6730 - 560-1171

Do not know

Defendant No. 2

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

Deborah A. Haendiges

Erie County Judge

25 Delaware Avenue United States

Buffalo, United States, Erie County

New York 14202

716-845-9300

Do not know

Defendant No. 3

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

City of Lackawanna Police

Police Officers

714 Ridge Rd.

Lackawanna Erie County

New York 14218

716-822-4900

Do not know

Defendant No. 4

Name
Job or Title (if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address (if known)

John Garcia

Erie County Sheriff

120 W. Eagle Street

Buffalo Erie

New York 14202

716-858-1757

Do not know

b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

50 million Dollars time lost from work, Shame of being in jail
I'm a store owner, and I own houses in Buffalo.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

my Sixth Amendment was violated By Erie County Court and Judge Haendiges I was wrongfully locked for then 6 months without any court date I spent more then a year in jail with no deposits. City of Lackawanna Police, Called me a Sand Nigger and kept calling me and referring to me a you people or muslim scum Both my family and myself. Erie County Jail would not allow me to pray or use my religious items for worship as required by my religion. (Please see additional page)

IV. Relief (Please See addition page)

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I am Seeking 50 million in damages, Time lost with family, Time lost from work, Mental damage from being lock up and called Sand nigger, Camal jockie, (I am Indian) Medical Stress to my Body from the mental stress, and not getting proper medical care while in jail. Deborah A. Haendiges in Court calling me names like you people. The Assigned Counsel telling just be quiet and do as you are told. Lackawanna Police scaring people coming into my store in Lackawanna John Garcia head of the Sheriff's not having ever site into the people working

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. Sixth Amendment of the United States Constitution

Freedom of Religion, Racial discrimination, Hate Crime, and First Amendment violation, wrongful incarceration, Miranda rights violation, Professional misconduct by a officer of a Court

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) N/A, is a citizen of the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) N/A, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

Tamjid Mahmud Hossain b10, (born 1979) born in

(Number 1. Additional Page)

On page 3. II. Basis for Jurisdiction

under what basis for Federal Court jurisdiction

I marked both Boxes, because I was not sure which one apply in my case, I was born in India but married an American after living here for sometime and had already gotten my green card and became a citizen of the United States of America before I married, but I believe from my understanding of the laws and rights of any citizen I am now Protected Civil rights under the Constitution

On page 4, I V. Relief

John Corcio, The Sheriff of Erie County, The head of all things having to do with the Sheriff's of Erie County, and the rules and runnings of such, including the Erie County Holding Center and the Erie County Correctional Facility. None of which would allow me to do the things that is required by my (Religion.) I wrote many grievance, having to do with my rights of religion and they did not respond or made jest of it. Deborah, A. Hendige made statements in Court "You People" "All men should be punished. Both statements show she is, Racist and Sexist and Her Discrimination!

To The Court Clerk:

~~Also~~ Please tell me if did any of the paper work wrong so I may correct it, Also please let me know the next steps, what I need to do next?

Thank you,

Also Seeking Relief for Professional Misconduct from my Assigned Counsel (Michael L. Limasy)

(ON BACK) →

Michael C. Cimsy, Did not tell me of my Civil Rights no matter how many times I asked him, nor did inform me of how the Court worked, and would never return calls or talk to me about my case and also has made racist comments-improper counsel.

I was never Read my Miranda Rights or told of them by Lackawanna Police when they took me into Custody. Calling me racist names (sard nigger) and said Miranda only applies to U.S. Citizens. (I am U.S. Citizen) and I became one the right way!!

Thank you for looking in to my Request for Relief from these injustices.

The dates of the acts against me. My arrest by Lackawanna Police 12-4-2023 Court 11-14-25 and illegal incarceration began on 12-4-2023 until 2-13-2025

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

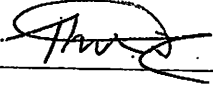
A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff

Printed Name of Plaintiff


 Tam Jio Mahmud Hossain

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address